

Lauren A. Moskowitz (*pro hac vice*)
lmoskowitz@cravath.com
Lauren M. Rosenberg (*pro hac vice*)
lrosenberg@cravath.com
CRAVATH, SWAINE & MOORE LLP
375 Ninth Avenue
New York, New York 10001
Telephone: (212) 474-1000
Facsimile: (212) 474-3700

Robert Salcido (SBN 139138)
rsalcido@akingump.com
AKIN GUMP STRAUSS HAUER & FELD LLP
4 Park Plaza, Suite 1900
Irvine, CA 92614
Telephone: (949) 885-4100
Facsimile: (949) 885-4101

Attorneys for Defendant Epic Systems Corporation

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

CureIS Healthcare, Inc.,

Plaintiff,

v.

Epic Systems Corporation,

Defendant.

Case No.: 3:25-cv-04108-MMC

**DEFENDANT'S ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED**

Judge: Hon. Maxine M. Chesney

Pursuant to Civil Local Rule 7-11 and 79-5(f), Defendant Epic Systems Corporation (“Epic”) submits this administrative motion to consider whether another party’s material should be sealed (“Administrative Motion”), filed in connection with Defendant’s Notice of Motion and Motion to Transfer Venue to the Western District of Wisconsin Pursuant to 28 U.S.C. § 1404(a) (Epic’s “Motion to Transfer Venue”), Declaration of Lauren A. Moskowitz in Support of Defendant Epic Systems Corporation’s Motion to Transfer Venue (“Moskowitz Declaration”), Exhibits C and D accompanying the Moskowitz Declaration, and the Declaration of Jennifer Peterson in Support of Defendant Epic Systems Corporation’s Motion to Transfer Venue (“Peterson Declaration”). The portions of documents Epic seeks to temporarily file under seal are listed below:

Document	Corresponding Page and Line Number(s)
Motion to Transfer Venue	Page 5, Lines 6-8
Motion to Transfer Venue	Page 6, Line 21
Motion to Transfer Venue	Page 6, Lines 23-24
Motion to Transfer Venue	Pages 6-7, Lines 25-1, Fn. 3
Motion to Transfer Venue	Page 12, Lines 13, 15
Motion to Transfer Venue	Page 13, Lines 25-28
Motion to Transfer Venue	Page 14, Line 2
Motion to Transfer Venue	Page 14, Lines 4-6, 8
Motion to Transfer Venue	Page 14, Line 10, Fn. 6
Motion to Transfer Venue	Page 14, Line 12
Motion to Transfer Venue	Page 15, Line 6
Moskowitz Declaration	Page 2, Line 1
Moskowitz Declaration	Page 2, Line 5
Exhibit D to Moskowitz Declaration	Document in its entirety
Exhibit E to Moskowitz Declaration	Document in its entirety
Peterson Declaration	Page 3, Lines 8-9
Peterson Declaration	Page 4, Lines 4-6

Document	Corresponding Page and Line Number(s)
Peterson Declaration	Page 4, Lines 8-10
Peterson Declaration	Page 4, Lines 12-14
Peterson Declaration	Page 4, Lines 15-17
Peterson Declaration	Page 4, Lines 19-21
Peterson Declaration	Page 4, Lines 22-24
Peterson Declaration	Page 4, Lines 25-27

Magistrate Judge Kim previously granted CureIS HealthCare, Inc.’s (“CureIS”) request to redact the names of CureIS’s customers named in the Complaint. (*See* Dkt. No. 5 at 1.) Epic reserves the right and intends to file a motion to seek the unsealing of the customer-identifying information that Magistrate Judge Kim previously permitted. Epic disputes CureIS’s prior representation submitted in connection with CureIS’s Administrative Motion to File Under Seal Portions of Plaintiff’s Complaint that it “goes to great lengths to keep the identities of its customers confidential.” (Dkt. No. 2 at 2.) Among other reasons, CureIS has publicly touted its relationships with a number of the redacted customers on its own website for years.

Nonetheless, given that Magistrate Judge Kim’s order currently remains in place, Epic provisionally files portions of its Motion to Transfer, Moskowitz Declaration, Exhibits C and D accompanying the Moskowitz Declaration, and Peterson Declaration under seal because they reflect information regarding the same customers covered by that order, including the business addresses of those customers and the names of Epic employees who are specifically assigned to those customers, whose identities could potentially be used to reveal the identities of the underlying customers. Epic reserves the right and intends to oppose, under Rule 79-5(f)(4), any submission CureIS makes to support sealing of this information under Rule 79-5(f)(3).

1 Dated: June 17, 2025

Respectfully submitted,

2 By: /s/ Lauren A. Moskowitz

3 **CRAVATH, SWAINE & MOORE LLP**

4 Lauren A. Moskowitz (*pro hac vice*)

5 lmoskowitz@cravath.com

6 Lauren M. Rosenberg (*pro hac vice*)

7 lrosenberg@cravath.com

8 375 Ninth Avenue

9 New York, New York 10001

Telephone: (212) 474-1000

Facsimile: (212) 474-3700

10 **AKIN GUMP STRAUSS HAUER & FELD**

11 **LLP**

12 Robert Salcido (SBN 139138)

13 rsalcido@akingump.com

14 4 Park Plaza, Suite 1900

15 Irvine, California 92614

16 Telephone: (949) 885-4100

17 Facsimile: (949) 885-4101

18 *Attorneys for Defendant Epic Systems*

19 *Corporation*